

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MASSACHUSETTS

JULIA HEAVERN, BY HER PARENTS AND)	
NEXT FRIENDS, DENISE AND PAUL HEAVERN,)	
NICOLE HEAVERN, BY HER PARENTS AND)	
NEXT FRIENDS, DENISE AND PAUL HEAVERN,)	
KERIN MITCHELL, BY HER PARENTS AND)	
NEXT FRIENDS, ELLEN AND JIM MITCHELL,)	
TAYLOR VIEIRA, BY HER PARENTS AND)	
NEXT FRIENDS, KATHY AND STEVE VIEIRA,)	C.A. NO.: 05-11170MEL
AND BRIAN VIEIRA, BY HIS PARENTS AND)	
NEXT FRIENDS, KATHY AND STEVE VIEIRA)	
Plaintiffs)	
)	
v.)	
)	
CAPITAL HOTEL COMPANY)	
Defendant)	


PROPOSED JOINT DISCOVERY STATEMENT

NOW COME THE PARTIES in the above-referenced matter and pursuant to Order of the Court dated August 20, 2007 hereby file the proposed discovery and Rule 56 schedule:

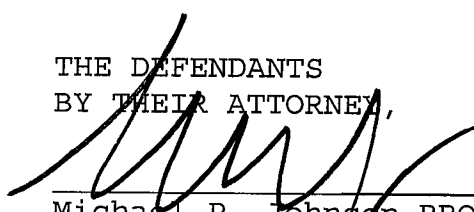
1. Discovery shall be completed by December 7, 2007; and
2. Motions for Rule 56 shall be filed on or before
February 28, 2008.

Respectfully submitted,

THE PLAINTIFFS,
BY THEIR ATTORNEY,


Colleen Carroll
Walsh, Firnrohr, Carroll
& McCarthy
272 Saint George St.
Marshfield, MA 02332
(781) 934-6495

THE DEFENDANTS
BY THEIR ATTORNEY,


Michael P. Johnson BBO# 641827
Boyle, Morrissey & Campo, P.C.
695 Atlantic Avenue
Boston, MA 02111
(617) 451-2000

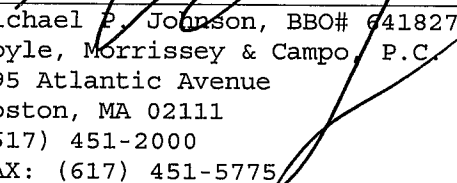
CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(a) and/or Sup. Ct. R. 9A, I, Michael P. Johnson, do hereby certify that a copy of the foregoing documents have been served first-class postage prepaid on all parties or their representatives in this action as listed below:

COUNSEL FOR THE PLAINTIFF

Colleen Carroll, Esq.
Walsh, Firnrohr, Carroll & McCarthy
272 Saint George St.
Duxbury, MA 02332

SIGNED UNDER THE PENALTIES OF PERJURY THIS 23rd DAY OF August, 2007.



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